

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ROOFERS' PENSION FUND,
Individually and On Behalf of All
Others Similarly Situated,

Plaintiffs,

v.

PERRIGO COMPANY PLC, *et al.*,

Defendants.

)
) Civil Action No. 2:16-cv-02805-MCA-
) LDW
)
)

) **DECLARATION OF JAMES E.**
) **ANKLAM IN SUPPORT OF**
) **DEFENDANTS' OPPOSITION TO**
) **LEAD PLAINTIFF'S MOTION FOR**
) **CLASS CERTIFICATION**
)
)
)
)
)

JAMES E. ANKLAM declares pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner of the law firm Fried, Frank, Harris, Shriver & Jacobson LLP, attorneys for defendant Perrigo Company plc. I submit this Declaration in Support of Defendants' Opposition to Lead Plaintiff's Motion for Class Certification, submitted by defendants Perrigo Company plc, Joseph Papa, and Judy Brown, by and through their respective counsel. I have personal knowledge of the facts asserted herein, and could testify to those facts if called to do so.

2. Attached as Exhibit 1 is a true and correct copy of Plaintiffs' Amended Complaint for Violation of the Federal Securities Laws, dated June 21, 2017.

3. Attached as Exhibit 2 is a true and correct copy of excerpts from the Perrigo Company plc Current Report, filed with the SEC on Form 8-K on December 13, 2013.

4. Attached as Exhibit 3 is a true and correct copy of excerpts from the Perrigo Company plc Current Report, filed with the SEC on Form 8-K on November 12, 2014.

5. Attached as Exhibit 4 is a true and correct copy of excerpts from the Perrigo Company plc Quarterly Report for the quarter ending December 27, 2014, filed with the SEC on Form 10-Q on February 5, 2015

6. Attached as Exhibit 5 is a true and correct copy of the Perrigo Company plc Current Report, filed with the SEC on Form 8-K on March 30, 2015

7. Attached as Exhibit 6 is a true and correct copy of the Perrigo Company plc Current Report, filed with the SEC on Form 8-K on April 9, 2015.

8. Attached as Exhibit 7 is a true and correct copy of the Perrigo Company plc Current Report, filed with the SEC on Form 8-K on April 21, 2015.

9. Attached as Exhibit 8 is a true and correct copy of the Perrigo Company plc Current Report, filed with the SEC on Form 8-K on April 24, 2015.

10. Attached as Exhibit 9 is a true and correct copy of the Perrigo Company plc Current Report, filed with the SEC on Form 8-K on April 29, 2015.

11. Attached as Exhibit 10 is a true and correct copy of excerpts from the Perrigo Company plc Quarterly Report for the quarter ending March 28, 2015, filed with the SEC on Form 10-Q on April 29, 2015.

12. Attached as Exhibit 11 is a true and correct copy of excerpts from the Perrigo Company plc Annual Report for the year ending June 27, 2015, filed with the SEC on Form 10-K on August 13, 2015.

13. Attached as Exhibit 12 is a true and correct copy of the Perrigo Company plc Current Report, filed with the SEC on Form 8-K on September 14, 2015.

14. Attached as Exhibit 13 is a true and correct copy of excerpts from the Perrigo Company plc Current Report, filed with the SEC on Form 8-K on November 13, 2015.

15. Attached as Exhibit 14 is a true and correct copy of excerpts from the Perrigo Company plc Current Report, filed with the SEC on Form 8-K on February 18, 2016.

16. Attached as Exhibit 15 is a true and correct copy of excerpts from the Perrigo Company plc Annual Report for the year ending December 31, 2015, filed with the SEC on Form 10-KT on February 25, 2016.

17. Attached as Exhibit 16 is a true and correct copy of excerpts from the Perrigo Company plc Current Report, filed with the SEC on Form 8-K on May 16, 2016.

18. Attached as Exhibit 17 is a true and correct copy of excerpts from the Perrigo Company plc Quarterly Report for the quarter ending July 2, 2016, filed with the SEC on Form 10-Q on August 10, 2016.

19. Attached as Exhibit 18 is a true and correct copy of excerpts from the Perrigo Company plc Annual Report, filed with the SEC on Form 8-K on November 10, 2016.

20. Attached as Exhibit 19 is a true and correct copy of excerpts from the Perrigo Company plc Annual Report for the year ending December 31, 2016, filed with the SEC on Form 10-K on May 22, 2017.

21. Attached as Exhibit 20 is a true and correct copy of a transcript of the Perrigo Company plc first quarter 2015 earnings conference call, dated November 6, 2014.

22. Attached as Exhibit 21 is a true and correct copy of a transcript of the Perrigo Company plc second quarter 2015 earnings conference call, dated February 5, 2015.

23. Attached as Exhibit 22 is a true and correct copy of a transcript of the Perrigo Company plc fourth quarter 2015 earnings conference call, dated February 18, 2016.

24. Attached as Exhibit 23 is a true and correct copy of excerpts from the Mylan N.V. Quarterly Report for the quarter ending September 30, 2016, filed with the SEC on Form 10-Q on November 9, 2016.

25. Attached as Exhibit 24 is a true and correct copy of excerpts from the Aceto Corporation Current Report, filed with the SEC on Form 8-K on December 21, 2016.

26. Attached as Exhibit 25 is a true and correct copy of the Perrigo Company plc Prospectus Form, filed by Mylan N.V. with the SEC on Form 425 on April 24, 2015.

27. Attached as Exhibit 26 is a true and correct copy of Mylan N.V.'s preliminary proxy statement filed with the SEC on Form 14A on May 5, 2015.

28. Attached as Exhibit 27 is a true and correct copy of Mylan N.V.'s proxy statement definitive additional materials filed with the SEC on Form 14A on August 20, 2015.

29. Attached as Exhibit 28 is a true and correct copy of the Perrigo Company plc Prospectus Form, filed by Mylan N.V. with the SEC on Form 425 on August 28, 2015.

30. Attached as Exhibit 29 is a true and correct copy of the Perrigo Company plc Prospectus Form, filed with the SEC on Form 425 on September 14, 2015.

31. Attached as Exhibit 30 is a true and correct copy of the Perrigo Company plc Prospectus Form, filed with the SEC on Form 425 on November 10, 2015.

32. Attached as Exhibit 31 is a true and correct copy of a Bloomberg News article entitled "Perrigo Joins Firms With Generic Drugs Under U.S. Glare," dated March 3, 2017.

33. Attached as Exhibit 32 is a true and correct copy of Notice of Motion for Consolidation of Related Actions, Appointment as Lead Plaintiff, and Approval of Counsel filed in *In re Mylan N.V. Sec. Litig.*, 1:16-CV-7926 (JPO) (S.D.N.Y.), dated December 12, 2016.

34. Attached as Exhibit 33 is a true and correct copy of the Amended Class Action Complaint for Violations of Securities Laws filed in *In re Mylan N.V. Sec. Litig.*, 1:16-CV-7926 (JPO) (S.D.N.Y.), dated March 20, 2017.

35. Attached as Exhibit 34 is a true and correct copy of excerpts from the transcript from the deposition of Isaac Drucker on March 4, 2019.

36. Attached as Exhibit 35 is a true and correct copy of excerpts from the transcript from the deposition of Uri Bar Tov on March 4, 2019.

37. Attached as Exhibit 36 is a true and correct copy of excerpts from the transcript from the deposition of Liat Cohen-David on March 5, 2019.

38. Attached as Exhibit 37 is a true and correct copy of excerpts from the transcript from the deposition of Moshe Rabbanyan on March 5, 2019.

39. Attached as Exhibit 38 is a true and correct copy of excerpts from the transcript from the deposition of Roni Tirosh Maderer on March 6, 2019.

40. Attached as Exhibit 39 is a true and correct copy of excerpts from the transcript from the deposition of Yuval Beer Even on March 6, 2019.

41. Attached as Exhibit 40 is a true and correct copy of Exhibit 2 referenced during the depositions of Moshe Rabbanyan, on March 5, 2019, and Yuval Beer Even, on March 6, 2019, containing Appendix 1 to Lead Plaintiff's Corrected Responses and Objections to Defendant Perrigo Company, plc's First Set of Interrogatories, dated March 4, 2019.

42. Attached as Exhibit 41 is a true and correct copy of Exhibit 16 referenced during the deposition of Liat Cohen-David, on March 5, 2019, containing Lead Plaintiff's Update to Appendix 1 of Lead Plaintiff's Corrected Responses and Objections to Defendant Perrigo Company, plc's First Set of Interrogatories, dated March 5, 2019.


43. Attached as Exhibit 42 is a true and correct copy of Exhibit 13 referenced during the depositions of Uri Bar Tov, on March 4, 2019, Moshe Rabbanyan, on March 5, 2019, and Yuval Beer Even, on March 6, 2019, containing a copy of a Haaretz story dated June 23, 2015 and entitled "The Ticker: Top Mylan Executive In Israel to Pitch Perrigo Bid," dated March 4, 2019.

44. Attached as Exhibit 43 is a true and correct copy of Mylan N.V.'s definitive proxy statement filed with the SEC on Form 14A on July 28, 2015.

45. Attached as Exhibit 44 is a true and correct copy of excerpts from the transcript from the deposition of Dr. Zachary Nye on April 2, 2019.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 17, 2019.



James E. Anklam